ECFS - E-mail Filing <PROCEEDING> 03-104 <DATE>7/7/03 <NAME>Mark Johnson <ADDRESS1> Box 1035 <ADDRESS2> <CITY>Ashburn <STATE>Va <ZIP>20146 <LAW-FIRM> <ATTORNEY> <FILE-NUMBER> <DOCUMENT-TYPE> <PHONE-NUMBER>703-626-1803 <DESCRIPTION> <CONTACT-EMAIL>w3zi@arrl.net <TEXT> Federal Communications Commission Comments on ET Docket 03-104 (Broadband

over Power Line Notice of Inquiry)

In response to this NOI, I am writing to express my concern with the proposed development and implementation of "Broadband Over Powerline" (BPL) technology.

As a licensed Amateur Radio Operator, I am deeply concerned with the interference that can be generated

by this type of technology. As currently written, FCC Part 15 limits for BPL technology can result in

substantial interference in the Amateur Radio frequency spectrum as well as frequency spectrum utilized by other licensed radio services.

Central to the implementation of BPL services is the utilization of existing utility power wiring which was

not designed to accommodate the emissions that would accompany BPL. BPL systems will radiate on

broad ranges of spectrum that have a much greater interference potential than localized power systems that utilize switching power supplies or electric motors.

How will BPL radiation affect the Amateur Radio Service who utilize frequency spectrum at HF, VHF and

UHF? There is also significant interference potential to other consumer services such as telephone and cable television that must be examined.

I understand some field trials of BPL are currently underway. While these may provide some answers ${\tt I}$

would suggest that given the complexity of the issues and unknowns with BPL systems, the FCC needs to

consider the many variables involved in this technology and its proposed implementation and fully address

potential interference with other licensed services and consumers. It seems these field trials need to be

much more extensive to ensure all licensed users of spectrum are considered and protected. Its worth

noting that no field trials to date have specifically included Amateur Radio or incorporated any interference studies.

The Amateur Radio Service is a valuable national resource that is key to providing a voluntary public communications system in times of local and national emergency. Time and again Amateur Radio has proven its value and its spectrum must be protected.

Sincerely,

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